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January 4, 2018

**BY ECF AND FAX (212-805-6737)**

Judge George B. Daniels  
United States District Judge  
United States District Court, Southern District of New York  
500 Pearl Street  
New York, New York 10007

Re: Continental Casualty Co. v. Al Qaeda Islamic Army, 04 Civ. 5970  
In Re Terrorist Attacks on September 11, 2001 03 MDL 1570

Dear Judge Daniels:

This firm represents the plaintiffs ("Plaintiffs") in *Continental Casualty Co. v. Al Qaeda Islamic Army*, 04 Civ. 5970, which is part of the multi-district litigation *In Re Terrorist Attacks on September 11, 2001*, 03 MDL 1570. Plaintiffs respectfully request a further extension of their time, from January 11, 2018 until January 25, 2018, to file objections to Magistrate Judge Netburn's report and recommendation, dated November 27, 2017 (the "Report"), with regard to Plaintiffs' application for an assessment of damages against defendant the Islamic Republic of Iran. Your Honor has already granted the Plaintiffs' Executive Committee for Commercial Claims an extension of time until January 25 to file a brief with regard to the Report and it would promote judicial efficiency if all submissions with regard to the Report were made at the same time. Moreover, as the Report concerns a default judgment against Iran, a party that has never appeared in this litigation, the proposed extension will not result in any delay in the broader MDL proceedings.

Plaintiffs thank this Court for its consideration of this request.

Respectfully submitted,



Robert M. Kaplan